

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re:	:	
	:	
THOMAS M. JOHNSON, III,	:	Bankruptcy No. 1:10-bk-01151-HWV
	:	
Debtor	:	Chapter 11
	:	
THE BANK OF NEW YORK MELLON	:	
F/K/A/ THE BANK OF NEW YORK AS	:	
SUCCESSOR IN INTEREST TO JP	:	
MORGAN CHASE BANK, N.A. AS	:	
TRUSTEE FOR STRUCTURED ASSET	:	
MORTGAGE INVESTMENTS II	:	
TRUST 2006-AR7 MORTGAGE PASS-	:	
THROUGH CERTIFICATES SERIES	:	
2006-AR7	:	
	:	
Movant,	:	
	:	
v.	:	
THOMAS M. JOHNSON, III, and	:	
GREGORY R. LYONS, Trustee	:	
Respondents	:	

ANSWER TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY

AND NOW, comes Debtor, Thomas M. Johnson, III, by and through his undersigned counsel, answering the Motion for Relief from the Automatic Stay as follows:

1. Admitted.
2. Denied. Gregory R. Lyons is deceased and was never the duly appointed Chapter 11 Trustee. Mr. Lyons worked as an attorney in the Unites States Trustee Office.
3. Admitted.
4. Admitted.
5. Admitted.

6. Admitted.
7. Denied. The amount alleged to be due is disputed by Debtor.
8. Denied. The schedules filed in this proceeding are ten (10) years old. The subject real property has appreciated over this time period.
9. Admitted. However, Debtor has tendered the full amount noted to the Movant to satisfy the alleged arrearage.
10. Admitted.
11. Denied. Debtor has paid the arrearage.

WHEREFORE, Debtor respectfully requests this Honorable Court to dismiss the Motion for Relief from the Automatic Stay relating to the real property at 520 Lunalilo Home Road Unit 104, Honolulu, HI 96825-1708

Respectfully submitted,

LAW OFFICES OF CRAIG A. DIEHL

Date: January 28, 2021

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